

UNITED STATES DISTRICT COURT

for the
District of Rhode Island

United States of America
v.
LAWRENCE M. SULLIVAN
dob: 1978

Defendant

Case No.

1:14 MJ 217 A

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 09/15/2014 in the county of _____ in the _____ District of
Rhode Island, the defendant violated 18 U. S. C. § 2113(a), an offense described as follows:

Bank Robbery

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Steven A. Medeiros, Special Agent, Federal Bureau of Investigation.

☒ Continued on the attached sheet.



Complainant's signature

Special Agent, Steven A. Medeiros

Printed name and title

Sworn to before me and signed in my presence.

Date:

9/22/14



Judge's signature

City and state:

Providence, Rhode Island

LINCOLN D. ALMOND, U.S. MAGISTRATE

Printed name and title

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

FILED

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

United States of America

v.

Case No.

LAWRENCE M. SULLIVAN

Defendant

1:14MJ217A

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) LAWRENCE M. SULLIVAN

who is accused of an offense or violation based on the following document filed with the court:

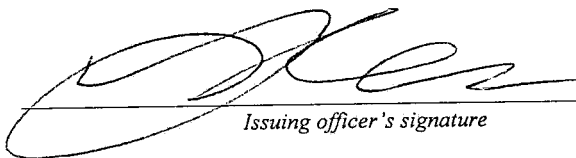
- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

BANK ROBBERY IN VIOLATION OF 18 U.S.C. §2113(a).

Date:

9/22/14


 Issuing officer's signature
City and state: Providence, RI

Lincoln D. Almond, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

 Arresting officer's signature

 Printed name and title

AFFIDAVIT

I, Steven Medeiros, do under oath depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been continuously employed in this capacity for eighteen years.
2. The following information is based upon my personal knowledge as well as information provided to me by other officers and agents and is presented in support of the issuance of a complaint and arrest warrant against Lawrence M. SULLIVAN, born in 1978, charging him with bank robbery, in violation of 18 U.S.C. § 2113(a).
3. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me regarding the instant investigation. More specifically, I have set forth only the pertinent facts that I believe are necessary to establish probable cause.
4. The Washington Trust Company is a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation.
5. On September 15, 2014, a white male wearing a black baseball hat, a white hooded sweatshirt, and jeans entered McQuade's Marketplace in Westerly, Rhode Island. The male approached a teller at the Washington Trust Company bank, which was located in the market. The teller later told officers that the male approached her station and demanded the cash from her drawer. The teller handed the man money and he ran out of the market. After the robbery, the teller totaled her station drawer and advised officers that she had given the suspect \$1,049.
6. Officers obtained store and bank surveillance footage of the robbery. The

suspect, who was later identified as Lawrence M. SULLIVAN, could be seen wearing a black baseball cap with a Red Sox "B" on the front. He also had on a white hooded sweatshirt with the Ecko Co. logo on the front.

7. Detective Michael Lamb of the Westerly Police Department reviewed surveillance footage and recognized the robbery suspect as Lawrence M. SULLIVAN, an individual Detective Lamb had arrested in August 2013.

8. On September 16, 2014, Groton Police officers arrested SULLIVAN, who was hiding in a storage closet at the Super 8 Motel in Groton, Connecticut. SULLIVAN had \$127 on his person, a white cellphone, and a Boston Red Sox cap. Officers seized a white Ecko, zip-up, hoodie sweatshirt from the motel room across the hall from the supply closet. The room had been rented by SULLIVAN's brother.

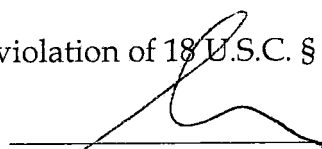
9. Officers transported SULLIVAN to the Groton police station where he was booked on a state warrant. During the booking process, Groton Police Officer Kimberly Snyder advised SULLIVAN of his constitutional rights. SULLIVAN was then taken to an interview room where he was advised of his rights again. SULLIVAN acknowledged in writing that he understood his rights and he also signed a waiver indicating that he was willing to speak with officers. Detective Lamb and Detective Steven Johnson from Westerly Police Department interviewed SULLIVAN. This interview was recorded.

10. During the interview, SULLIVAN told detectives that he borrowed a car from a friend, "Jennifer." He drove the car to McQuade's Marketplace and parked in an adjacent parking lot. He said he entered McQuade's through the main entrance and

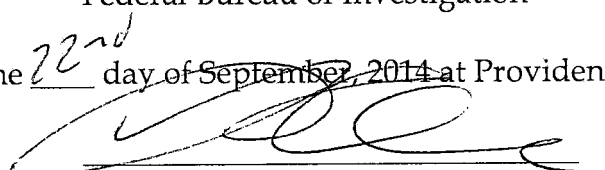
proceeded to the Washington Trust Company bank, which had a branch in the market. He said he was wearing his "hat, which [he] wear[s] everyday." He said he told the teller, "I want the money, don't fuckin press a button, no dye packs. I want all the money now." He denied mentioning a gun, although the teller claimed that he said, "don't say anything, don't push any alarms, listen to me, no dye packs, no alarms, open the drawer give me the cash. I'm serious. Open the drawer, no dye packs, open the drawer and give me the cash I'm dead serious I'll start shooting." SULLIVAN said the teller handed him an estimated \$800 or \$900. He said he then left the bank on foot and returned to Jennifer's vehicle. He left the lot and drove to Hartford to buy heroin, crack cocaine, and powder cocaine.

11. Detective Lamb showed SULLIVAN a photograph from the bank security camera depicting the robber. SULLIVAN identified himself as the man in the picture.

12. Based on the foregoing, I request that an arrest warrant be issued for Lawrence M. SULLIVAN for bank robbery, in violation of 18 U.S.C. § 2113(a).


STEVEN A. MEDEIROS
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this the 22nd day of September, 2014 at Providence, Rhode Island.


LINCOLN D. ALMOND
United States Magistrate Judge
District of Rhode Island